

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHWESTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 21-5003-01-CR-SW-MDH
)	
WILLIAM D. JOHNSON,)	
)	
Defendant.)	

MOTION FOR CONTINUANCE

COMES NOW Defendant, William D. Johnson, by his attorney and hereby requests a continuance in the September 20, 2021 trial setting in this case.

SUPPORTING SUGGESTIONS

1. This case is a six count indictment charging a drug conspiracy with four named co-conspirators. Co-conspirator Rita Glasgow has not yet appeared in the case.
2. Counsel seeks a continuance in the trial of the case based on his inability to be fully prepared to give the defendant his Constitutional rights to effective representation under the present time constraints.
3. The case is relatively new and counsel entered his appearance in February, 2021. In additional, counsel very recently was positive for the COVID virus and as of the current date still suffers from chronic fatigue and brain fog symptoms that severely diminishes counsel's ability to focus, concentrate, and deal with the analysis required in the preparation and trial of the issues.
4. Counsel is getting somewhat better and will fully recover but must ask for a later trial setting to be sure that this defendant's constitutional rights to Due Process and effective representation are fully protected.
5. The Defendant is in full agreement and a Speedy Trial Waiver is on file with the

Court.

WHEREFORE, defendant respectfully requests that this continuance be granted so that he may defend himself with full Constitutional protection.

/s/ Donald R. Cooley
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CERTIFICATE OF SERVICE

I hereby certify that the filing of this Motion on the CM/ECF computer system, which also delivers copies of the same to all counsel of record, was performed on this 10th day of August, 2021.

/s/ Donald R. Cooley
Donald R. Cooley